



NORTH AMERICA SOUTH AMERICA EUROPE ASIA

35 W. Wacker Drive  
Chicago, IL 60601  
T +1 (312) 558-5600  
F +1 (312) 558-5700

**CARDELLE SPANGLER**  
Partner  
(312) 558-7541  
CSpangler@winston.com

June 6, 2024

**VIA CM/ECF**

Honorable Ona T. Wang  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Frank Liu vs. The Nielsen Company (US), LLC, et al.; Case No.: 1:22-cv-09084-JHR-OTW**

Dear Judge Wang:

On behalf of defendants The Nielsen Company (US), LLC and TNC US Holdings (collectively, “Defendants”), we write to respectfully request that Defendants’ Letter Motion to Seal Plaintiff Frank Liu’s (“Plaintiff”) Sur-Reply Opposition to Defendants’ Motion to Dismiss, dated May 24, 2024 [Dkt. 89, 89-1, “Sur-Reply Opposition”], electronically filed publicly at Dkt. 91, be instead removed from the docket, or in the alternative, itself filed under seal. For the same reasons stated in Defendants’ Letter Motion to Seal at Dkt. 91 to support removal from the public record and the filing under seal of Plaintiff’s Sur-Reply Opposition, and which are incorporated by reference herein, Defendants’ Letter Motion to Seal itself was intended to be submitted to the Court via email rather than public ECF filing, in order to avoid filing an additional public document that includes the defamatory and private information included in Plaintiff’s initial public filing at Dkt. 89, 89-1.

Should Your Honor require any additional information, please feel free to contact me. We appreciate your consideration in this matter.

WINSTON  
& STRAWN  
LLP

June 6, 2024  
Page 2

Dated: Chicago, Illinois  
June 6, 2024

Respectfully submitted,

*Cardelle B. Spangler*

Cardelle Spangler (*admitted pro hac vice*)

WINSTON & STRAWN LLP

35 W. Wacker Drive

Chicago, Illinois 60601

(312) 558-5600

CSpangler@winston.com

*Attorneys for Defendants*

cc: Plaintiff Frank Liu